

### **REMARKS**

This Amendment is responsive to the Final Office Action dated June 26, 2008, accompanies a Request for Continued Examination (RCE), and constitutes the required submission. Applicant has amended claims 1, 4, 6–8, and 34. Applicant has also cancelled claims 12–33 and 35 from further consideration. Applicant is not conceding or admitting that the subject matter encompassed by claims 12–33 and 35, as previously presented, is unpatentable over the art cited by the Examiner. Applicant has cancelled claims 12–33 and 35 in this Amendment solely to facilitate expeditious prosecution of the remaining claims towards allowance. Applicant respectfully reserves the right to pursue the subject matter encompassed by claims 12–33 and 35 as previously presented, as well as any additional claims, in one or more continuing applications. Claims 1–11 and 34 are pending upon entry of this Amendment.

### **Objection to the Specification**

In the Final Office Action, the Examiner objected to the specification, asserting that the phrase “complete representation of an individual event,” as recited in the claims, is not supported in the specification. Applicant respectfully disagrees. However, in an effort to expedite prosecution of the claims to allowance, Applicant has removed this phrase from the pending claims in the present Amendment. Applicant therefore requests withdrawal of the objection to the specification.

### **Claim Rejections Under 35 U.S.C. § 103**

In the Final Office Action, the Examiner rejected claims 1–8, 12–19, 23–30, and 34–35 under 35 U.S.C. 103(a) as being unpatentable over McLean et al. (U.S. Publication No. 2003/0018506, hereinafter referred to as “McLean”) in view of Loeb et al. (U.S. Patent No. 6,725,287, hereinafter referred to as “Loeb”). The Examiner also rejected claims 9–10, 20–21, and 31–32 under 35 U.S.C. 103(a) as being unpatentable over McLean in view of Loeb as applied to claims 1–8, 13–19, and 23–30 above, and further in view of Zwilling et al. (U.S. Patent Publication No. 2004/0267828, hereinafter referred to as “Zwilling”). Finally, the Examiner rejected claims 11, 22 and 33 under 35 U.S.C. 103(a) as being unpatentable over McLean in view of Loeb as applied to claims 1–8, 13–19 and 23–30 above, and further in view

of Homayoun Yousefi'zadeh (U.S. Patent Publication No. 2004/0030739, hereinafter referred to as "Homayoun"). Applicant respectfully traverses these rejections to the extent they may be considered applicable to the claims as amended. These applied references fail to disclose or suggest the inventions defined by Applicant's claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed inventions.

Applicant has amended each of independent claims 1 and 34 require producing a sequence of view snapshots from a materialized view (wherein each view snapshot in the sequence corresponds to an individual event within a stream of events), storing the sequence of view snapshots, and using the sequence of view snapshots to generate an initialized view by retrieving and replaying the sequence of view snapshots. Applicant submits that the applied references fail to disclose or suggest each of these claim features.

In the Final Office Action, the Examiner interpreted the diagrammatic views, shown in FIGS. 25A–C of McLean (e.g., diagrammatic views of a customer object record 908, a product object record 909, and a financial object record 910) as the view snapshots within the meaning of Applicant's independent claims. The Examiner also interpreted an event view of event matrix 400, shown in FIG. 13 of McLean, as a view, or an initialized view, within the meaning of Applicant's independent claims. Applicant respectfully disagrees with these interpretations. Further, Applicant submits that McLean fails to disclose or suggest producing a sequence of view snapshots from a materialized view (wherein each view snapshot in the sequence corresponds to an individual event within a stream of events), storing the sequence of view snapshots, and using the sequence of view snapshots to generate an initialized view by retrieving and replaying the sequence of view snapshots.

In McLean, FIG. 25A illustrates a diagrammatic view of a customer object record 908, FIG. 25B illustrates a diagrammatic view of a product object record 909, and FIG. 25C illustrates a diagrammatic view of a financial object record 910. Applicant submits that these diagrammatic views and corresponding object records are not snapshots of the event matrix 400, or view snapshots within the meaning of Applicant's independent claims as amended. In other words, these diagrammatic views and corresponding object records are not produced as a sequence of items from event matrix 400 (or event matrix 901 shown in FIGS. 24A-24B of McLean).

As shown in the diagrammatic views of FIGS. 25A-25C McLean, object records stored in object database 902 include event relationship identifiers to “dynamically link appropriate events stored in the event matrix 901 with particular object records stored in the object database 902.”<sup>1</sup> However, these event relationship identifiers for such object records are simply references to particular events stored in event matrix 901 of McLean. For example, FIG. 25A shows an example of a customer object record 908 that includes three separate event relationship identifiers “99-4127”, “99-5201” and “99-6374”, which are references to separate events stored in event matrix 901, shown in FIGS. 24A-24B of McLean.

Therefore, even if the diagrammatic views and/or corresponding object records of McLean are interpreted as view snapshots, which Applicant does not admit, these diagrammatic views and/or records are not produced as a sequence of view snapshots from the event matrix 901, where each diagrammatic view or record corresponds to an individual event within a stream. Further, McLean fails to disclose or suggest storing these diagrammatic views or records and then subsequently generating a modified event matrix 901 by retrieving and replaying a sequence of stored diagrammatic views or records, as is required by Applicant’s amended independent claims. Nowhere does McLean even suggest that the diagrammatic views or records may be retrieved and replayed in a sequence in order to generate a modified version of an event matrix. Thus, Applicant submits that McLean fails to disclose or suggest producing a sequence of view snapshots from an initial or materialized view (wherein each view snapshot in the sequence corresponds to an individual event within a stream of events), storing the sequence of view snapshots, and using the sequence of view snapshots to generate an initialized view, or view state, by retrieving and replaying the sequence of view snapshots.

The remaining applied references, including Loeb, fail to overcome the deficiencies of McLean. On page 5 of the Office Action, the Examiner asserted that Loeb teaches “at least one stream of event [sic] is received as output from a streaming database system” and “external to the database system and at least one stream of events is received from the steaming [sic] database.” Applicant neither admits nor acquiesces that Loeb discloses, or even suggests, such features. Applicant does submit, however, that neither Loeb nor any of the other remaining applied references disclose or suggest producing a sequence of view snapshots from a materialized view

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<sup>1</sup> See, e.g., page 19, paragraph [0246] of McLean.

(wherein each view snapshot in the sequence corresponds to an individual event within a stream of events), storing the sequence of view snapshots, and using the sequence of view snapshots to generate an initialized view by retrieving and replaying the sequence of view snapshots, as required by independent claims 1 and 34 as amended.

Dependent claims 2–11 depend, either directly or indirectly, on independent claim 1. Thus, for at least the reasons outlined above regarding claim 1, Applicant further submits that the applied references fail to disclose or suggest each and every feature of dependent claims 2–11.

For at least these reasons, the applied references fail to establish a prima facie case for the non-patentability of Applicant's pending claims 1–11 and 34 under 35 U.S.C. 103(a).

Withdrawal of the rejections to these claims is therefore respectfully requested.

### CONCLUSION

All claims in this application are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

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